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Attorneys for Defendant
5 *Allied World Insurance Company*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JOYCE SIRIANNI,

9 Plaintiff,

10 v.

11 ALLIED WORLD INSURANCE COMPANY,
12 DEMETRIOS A. DALACAS, ESQ.,
13 individually, DEMETRIOS A. DALACAS,
ESQ., P.C., a Nevada professional corporation;
DOES I through X; and ROE BUSINESS
14 ENTITIES I through X; inclusive,

15 Defendants.

Case No: 2:20-cv-00118-KJD-EJY

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME TO FILE
OPPOSITION TO PLAINTIFF'S MOTION
TO REMAND**

(First Request)

16 Defendant ALLIED WORLD INSURANCE COMPANY ("Allied World") and Plaintiff
17 JOYCE SIRIANNI, by and through their respective counsel of record, hereby stipulate and agree to
18 extend the deadline for Allied World to file an opposition to Plaintiff's Motion to Remand filed on
19 February 14, 2020 (ECF No. 9) by fourteen (14) days, from February 28, 2020 to **March 13, 2020**.

20 This stipulation is submitted in compliance with LR IA 6-1. Counsel for Allied World
21 respectfully requests this extension due to firm-wide network issues resulting from a cyber security
22 incident that has impacted counsel's ability to access firm e-mail and files.

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1 The parties agree that the requested extension is not being requested in bad faith or to delay
2 these proceedings unnecessarily.

3 This is the first stipulation for extension of time to file an opposition

4 DATED this 26th day of February, 2020.

5 **WILSON, ELSE, MOSKOWITZ,**
6 **EDELMAN & DICKER LLP**

7 /s/ Chad C. Butterfield
8 CHAD C. BUTTERFIELD
9 Nevada Bar No. 10532
300 South Fourth Street, 11th Floor
10 Las Vegas, NV 89101
Attorneys for Defendant Allied World
Insurance Company

11 DATED this 26th day of February, 2020.


12 **PRINCE LAW GROUP**

13 /s/ Kevin T. Strong
14 DENNIS M. PRINCE
15 Nevada Bar No. 5092
16 KEVIN T. STRONG
17 Nevada Bar No. 12107
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18 Nevada Bar No. 15312
10801 West Charleston Blvd.
19 Las Vegas, NV 89135
Attorney for Plaintiff Joyce Sirianni

20 **ORDER**

21 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

22
23 Dated this 9th day of MARCH, 2020.

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26 UNITED STATES DISTRICT JUDGE
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